

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA

vs.

MILAN DIMITROV

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§

NO. 1:20-cr-00173(3)RP

UNOPPOSED MOTION TO CONTINUE ALL DEADLINES

**TO THE HONORABLE ROBERT PITMAN, UNITED STATES DISTRICT JUDGE FOR
THE WESTERN DISTRICT OF TEXAS, AUSTIN DIVISION:**

NOW COMES MILAN DIMITROV, Defendant in the above-entitled and numbered cause, by and through his undersigned Counsel, Donald H. Flanary, III., and files this Unopposed Motion to Continue all Deadlines in this cause. In support thereof, Defendant would respectfully show this Honorable Court as follows:

I.

Defendant in this case stands charged by Indictment with Counts 1- 2: IEEPA Conspiracy and IEEPA Violations in violation of 50 U.S.C. §§ 1702, 1705(a), and 1705(c); Count 3: ECRA False Statement in violation of 50 U.S.C. § 4819(a)(2)(F); and Count 4: Money Laundering in violation of 18 U.S.C. § 1956 in violation of Title 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C). Currently, among other deadlines, the Plea Agreement Deadline is set for November 7, 2024, Pretrial Motions Hearing is set for Friday, November 15, 2024, at 9:00 a.m., and Jury selection and Trial are set for Monday, November 25, 2024, at 9:30 a.m. Defendant respectfully requests a 60-day continuance.

II.

A continuance is requested because Undersigned Counsel and Government Counsel are currently working out the terms of a Protective Order with regards to discovery in this case. The Government has indicated that there is an extensive amount of electronic discovery (2 TB's) that will be provided to Undersigned Counsel once the Protective Order is finalized. Once Undersigned Counsel receives discovery additional time will be required to review the discovery, complete his investigation, and negotiate any potential agreements with Counsel for the Government. Counsel for the Government agrees that additional time is necessary to complete discovery in this case.

III.

Counsel for the Government, Assistant United States Attorney Karthik Srinivasan, is not opposed to this Motion to Continue all Deadlines in this cause.

This Motion for Continuance of all Deadlines is not made for purposes of delay, but that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully prays that this Honorable Court grant this Unopposed Motion to Continue all Deadlines filed in this cause and reset the deadlines of this matter for at least 60 days as agreed to by the parties and for other such relief that this Honorable Court deems just and right.

Respectfully Submitted,

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BY: /s/ Donald H. Flanary, III.
Donald H. Flanary, III.
State Bar No. 24045877

ATTORNEY FOR DEFENDANT,
Milan Dimitrov.

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2024, a true and exact copy of the above and foregoing Motion was electronically sent *via* CM/ECF to Karthik Srinivasan, Assistant United States Attorney.

/s/ Donald H. Flanary, III.
Donald H. Flanary, III.

CERTIFICATE OF CONSULTATION

This is to certify that Undersigned Counsel conferred with the Assistant United States Attorney regarding this motion and:

 X He does not oppose it.

 He does oppose it.

 Our attempts to resolve it were unsuccessful.

 Counsel were able to agree regarding the motion as follows: _____

 Counsel's attempt to contact the Government was unsuccessful.

/s/ Donald H. Flanary, III.
Donald H. Flanary, III.